

Yetta G. Kurland

Subject: ESI Proposal

From: David B. Rankin <DRankin@blhny.com>

Date: Fri, Mar 7, 2025 at 9:00 AM

Subject: ESI Proposal

To: Philion, Rachel S. <rphilion@proskauer.com>, Hurd, Steven D.

<shurd@proskauer.com> <shurd@proskauer.com>, Tucker, Jacob P.

<jtucker@proskauer.com>, Minicucci, Lora (LAW) <lminicuc@law.nyc.gov>

Cc: Yetta G. Kurland <kurland@kurlandgroup.com>, Tala Alfoqaha <talfoqaha@blhny.com>, Jackie BeVier <jbevier@blhny.com>

Hi All,

Our proposal is to run this, with the individuals indicated, and search 12-307 in addition to Local Law 19 – if the search is case sensitive, please use both L and I. At this point our request is to run this without any additional limiting constructions. Then report back to us with how many hits come, then we can further discuss the appropriate limitations if necessary. If this proposed search yields an astronomical number of hits, then we can reevaluate the proposal and make tweaks to the search terms you suggest.

Further, please produce ESI related to Document Request No. 7 from Plaintiffs' Second Supplemental Combined Discovery Demands, dated 6/1/23. For that request, please search for "MOU" "MOA" "Memorandum of Understanding" "Memorandum of Agreement" and "side letter" and custodians would be at OLR.

We agree with your proposal regarding the Mayor's office emails.

Best,
David

David B. Rankin (he/him) | Partner

Beldock Levine & Hoffman LLP

99 Park Avenue, PH/26th Fl. | New York, NY 10016

Tel: (212) 277-5825 Cell: (917) 455-0609

DRankin@blhny.com | <http://www.blhny.com>

This message may contain privileged material. If you are not the intended recipient, please return it.